BPA Policy 720-1

Sustainability Program

Table of Contents

| 1. | Purpose & Background | 2 |
|-----|---|---|
| 2. | Policy Owner | 2 |
| 3. | Applicability | 2 |
| 4. | Terms & Definitions | 2 |
| 5. | Policy | 2 |
| 6. | Policy Exceptions | 3 |
| 7. | Responsibilities | 3 |
| 8. | Standards & Procedures | 4 |
| 9. | Performance & Monitoring | 5 |
| 10. | Authorities & References | 5 |
| 11. | Review | 6 |
| 12. | Revision History | 6 |
| Арр | endix A: Sustainability Program Metrics | 7 |



1. Purpose & Background

This policy establishes the sustainability program which is administered by the Bonneville Power Administration (BPA) Sustainability Office to monitor sustainability performance, implement engagement and outreach activities, and develop and execute projects to reduce BPA's environmental impacts consistent with federal regulations. This policy establishes the roles, responsibilities, and guidelines for maintaining compliance with the sustainability goals defined in Executive Order (EO) 13834, Efficient Federal Operations; the strategic goals as expressed in the BPA 2018-2023 Strategic Plan; the core values of BPA Policy 110-1 Mission/Vision/Values Statement; as well as alignment with good business practices.

The BPA sustainability program ensures that the strategic benefits of sustainability are captured in agency decision making.

2. Policy Owner

The Chief Administrative Officer (CAO) owns this policy. The Sustainability Program Manager is responsible for its implementation and is authorized to develop, revise, and approve associated procedures, standards, and guidance.

3. Applicability

This policy applies to BPA operations that have an impact on the sustainability performance areas outlined in Appendix A.

4. Terms & Definitions

- A. **Sustainable Processes and Practices:** Processes and practices that reduce the negative environmental impacts and increase resource efficiency within the sustainability performance areas outlined in Appendix A.
- B. **The Climate Registry:** A greenhouse gas reporting program in the US and Canada. BPA reports its emissions to The Climate Registry.

5. Policy

It is BPA's policy to provide for sustainable and efficient operations pursuant to the requirements contained in the Energy Independence and Security Act of 2007, EO 13834, and other applicable statutes as listed in the Authorities & References section. BPA will factor environmental considerations into all decisions that impact the sustainability performance areas listed in Appendix A and strive to reduce environmental impacts from its operations in a manner consistent with its sustainability goals, strategic goals, and core values. Organizations whose operations impact sustainability performance will participate fully in the execution of this policy and partner with the Sustainability Office to complete the activities listed below.

| Organization | | Title | | | Unique ID |) |
|-----------------------------|-----|------------------------|-----------|-------|-----------|--------|
| Chief Administrative Office | | Sustainability Program | | 720-1 | | |
| Author App | | proved by | Date | Ve | rsion | |
| Molly Hatfield | CAC |), Robin Furrer | 4/17/2020 | 4.0 |) | Page 2 |

To support compliance in a manner consistent with good business practices, the sustainability goals defined in EO 13834, the strategic goals as expressed in the BPA 2018-2023 Strategic Plan, and the core values of BPA Policy 110-1 *Mission/Vision/Values Statement*, the following activities will be undertaken at BPA:

- A. Sustainability performance will be monitored and submitted to The Climate Registry, the Department of Energy, and the Environmental Protection Agency.
- B. Engagement and outreach activities will be undertaken to promote sustainable best practices with internal and external stakeholders.
- C. Special projects will be developed and executed to reduce BPA's environmental impact in the sustainability performance areas outlined in Appendix A.

6. Policy Exceptions

This policy does not apply to habitat conservation or restoration activities, the energy efficiency programs offered to BPA customers, or activities BPA may undertake to provide reasonable accommodation as required by the Americans with Disabilities Act.

7. Responsibilities

A. The **Sustainability Office** manages these activities:

1. Sustainability performance tracking

- a) Track the major environmental impacts in accordance with the sustainability performance areas listed in Appendix A.
- Track, analyze, and report metrics required to comply with federal mandates or support other sustainability projects.
- c) Submit performance data on an annual basis to federal, state, and national organizations such as The Climate Registry, the Environmental Protection Agency, and the Department of Energy Sustainability Performance Office.
- d) Collaborate with organizations across BPA to improve methods for capturing sustainability data.

2. Engagement and outreach

- a) Promote sustainable best practices with internal and external stakeholders by:
 - Publishing sustainability materials including articles, reports, or other written or visual materials;
 - ii) Organizing sustainability events to promote employee engagement; and
 - iii) Partnering with external stakeholders to advance and highlight BPA's sustainability efforts with the public.

| Organization | | Title | | | Unique ID |) |
|---|-----|-----------------|-----------|-------|-----------|--------|
| Chief Administrative Office Sustainability Progra | | ım | | 720-1 | | |
| Author App | | proved by | Date | Ve | rsion | |
| Molly Hatfield | CAC |), Robin Furrer | 4/17/2020 | 4.0 | | Page 3 |

3. Special projects

- a) Develop initiatives to maintain or improve BPA sustainability performance.
- b) Convene inter-organizational working groups to develop initiatives to maintain or improve BPA sustainability performance.
- c) Quantify the costs and benefits of any proposed initiative and share findings with stakeholders as needed.
- B. **Managers** whose operations impact the sustainability performance areas defined in Appendix A shall partner with the Sustainability Office in the following activities:

1. Sustainability performance tracking

- a) Ensure that relevant performance data are tracked and made available to the Sustainability Office.
- b) Collaborate with the Sustainability Office as needed to improve methods for capturing sustainability data.

2. Engagement and outreach

- a) Inform the Sustainability Office of sustainability achievements and any opportunities to better integrate sustainability into processes or decision making.
- b) Follow all sustainable processes and practices developed by the Sustainability Office.

3. Special projects

- a) Implement sustainability initiatives in partnership with the Sustainability Office.
- b) Participate in inter-organizational working groups to develop sustainability initiatives to maintain or improve BPA sustainability performance.
- c) Provide information to the Sustainability Office to track the progress, costs, and benefits of sustainability initiatives.
- C. **Communications** shall partner with the Sustainability Office in the following activities:
 - 1. Publish written and visual materials to promote sustainability events.
 - 2. Develop BPA Connection articles, reports, and social media campaigns to publicize sustainability initiatives and achievement.

8. Standards & Procedures

A. Procedures

The following BPA procedures will be followed to collect data related to sustainability performance for the following:

| Organization | | Title | | | Unique ID |) |
|-------------------------------------|-----|-----------------------|-----------|-----|-----------|--------|
| Chief Administrative Office Sustain | | Sustainability Progra | ım | | 720-1 | |
| Author App | | proved by | Date | Ve | rsion | |
| Molly Hatfield | CAC |), Robin Furrer | 4/17/2020 | 4.0 | 1 | Page 4 |

- 1. BPA Procedure 720-1-1, Climate Registry (under development).
 - This procedure describes the process of collecting data needed for BPA's reporting to The Climate Registry.
- BPA Procedure 720-1-2, Sustainability Reporting to DOE (under development).
 This procedure describes the process of collecting data needed for BPA's reporting to DOE.
- BPA Procedure 720-1-3, Sustainability Reporting to EPA (under development).
 This procedure describes the process of collecting data needed for BPA's reporting to EPA.

B. Standards

In cases where required data are not readily available, methodologies for collecting these data will be developed in coordination with the organizational managers.

9. Performance & Monitoring

The Sustainability Program is administered through the CAO's Program Management Office. The Sustainability Office ensures compliance with policy through:

- A. Submission of annual performance metrics to relevant agencies as described in the Standards & Procedures section of this policy.
- B. Monitoring levels of employee engagement and compliance with all mandated sustainability processes and practices.
- C. Implementation of sustainability performance improvement projects.

10. Authorities & References

- A. Energy Independence and Security Act of 2007
- B. Energy Policy Act of 1992
- C. Executive Order 13834, Efficient Federal Operations
- D. Implementing Instructions for Executive Order 13834 Efficient Federal Operations
- E. The Climate Registry Electric Power Sector Protocol
- F. The Climate Registry General Reporting Protocol
- G. BPA 2018-2023 Strategic Plan
- H. BPA Policy 110-1 Mission/Vision/Values Statement

| Organization | | Title | | | Unique ID |) |
|-----------------------------|-----|------------------------|-----------|-------|-----------|--------|
| Chief Administrative Office | | Sustainability Program | | 720-1 | | |
| Author App | | proved by | Date | Ve | rsion | |
| Molly Hatfield | CAC |), Robin Furrer | 4/17/2020 | 4.0 |) | Page 5 |

11. Review

This policy is scheduled for review by the Policy Owner at least annually to ensure the policy statements are accurate, complete, and current with all applicable regulations that govern sustainability in federal operations.

12. Revision History

| Version | | |
|---------|------------|---|
| Number | Issue Date | Brief Description of Change or Review |
| 3.0 | 8/3/2015 | Migration of content to new policy format. Replacement of IBS with CAO. Replacement of Sustainability Executive Steering Committee and BOB with CAO MC. Replacement of reference of cross-agency targets, KPIs & KSIs with annual targets. Replacement of Fossil Fuel Reduction with GHG emissions reduction. Replacement of scope of fossil fuel reduction initiative. Introduced Carbon Management and related terms and definitions which have already been part of the program since 2010. Allocation of tracking, analysis, reporting and management of the sustainability program to CAO Internal Ops team. Addition of a strategic planning 5 year cycle and action plan for support organizations. Eliminated storm water management component from policy as GC guidance. |
| 4.0 | 4/17/2020 | Title changed from "Sustainability Practices and Responsibilities" to "Sustainability Program." |

| Organization | | Title | | | Unique ID | |
|-----------------------------|------|------------------------|-----------|-------|-----------|--------|
| Chief Administrative Office | | Sustainability Program | | 720-1 | | |
| Author App | | roved by | Date | Ve | rsion | |
| Molly Hatfield | CAO, | , Robin Furrer | 4/17/2020 | 4.0 |) | Page 6 |

Appendix A: Sustainability Program Performance Areas and Reporting Metrics

| Sustainability Performance Area | Unit | Metric | Data Source |
|--|-------------------|--|---------------------|
| Alternative commuting rates | | | |
| The ratio of commuters who utilize options such as mass transit; carpooling; biking; walking; | Trips | Number of trips taken to and from work using an alternative mode of transportation | Workforce survey |
| telecommuting; compressed work weeks; and low- emission, fuel-efficient, or alternative-fuel vehicles to those who drive to and from their workplace in a conventional single-occupant vehicle. | Trips | Total number of trips taken to and from work | Workforce survey |
| | Miles | Distance traveled to and from work using an alternative mode of transportation | Workforce survey |
| | Miles | Total distance traveled to and from work | Workforce survey |
| Energy consumption | | | |
| The electricity and natural gas consumed by BPA facilities and equipment, including both station | Kilowatt hours | Total electricity consumed by facilities owned or controlled by BPA | NW, TP |
| service and utility purchases. | Therms | Total natural gas consumed by facilities owned or controlled by BPA | NW |
| Fleet fuel consumption | | | |
| The gasoline, diesel, propane, biofuel, and other alternative fuels consumed by BPA's owned and | Gallons | Total fossil fuels consumed by vehicles owned or leased by BPA | NS |
| leased vehicle fleets. | Gallons | Total alternative fuels consumed by vehicles owned or leased by BPA | NS |
| Greenhouse gas emissions | | | |
| The seven gases – carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, sulfur | Gallons | Total aviation fuel consumed by planes or helicopters owned by BPA | ТА |
| hexafluoride, and nitrogen trifluoride – recognized by the Kyoto Protocol as contributing to the greenhouse effect, reflecting energy from the | Gallons | Total diesel and biodiesel consumed by emergency generators at BPA facilities | NW, TT |
| atmosphere back toward the earth's surface. BPA emits greenhouse gases during the course of its | Metric tons | Total HFC-134a emitted by refrigerators at BPA facilities | NW |
| daily operations. Scope 1 greenhouse gas emissions: Direct emissions from sources that are owned or | Metric tons | Total HFC-134a emitted by vehicles owned or leased by BPA | NS |
| controlled by the agency, such as vehicles and equipment, stationary sources, on-site landfills, | Metric tons | Total SF6 emitted by equipment owned by BPA | EP |

| Organization | | Title | | | Unique II |) |
|--|-----|-----------------------|-----------|-----|-----------|--------|
| Chief Administrative Office Sustainability Pro | | Sustainability Progra | m | | 720-1 | |
| Author App | | proved by | Date | Ve | rsion | |
| Molly Hatfield | CAC |), Robin Furrer | 4/17/2020 | 4.0 |) | Page 7 |

| wastewater treatment facilities, and fugitive emissions. | Megawatt hours | Transmission line losses from power transmitted by BPA | ТР |
|---|-------------------|---|--------|
| Scope 2 greenhouse gas emissions: Indirect emissions resulting from the generation of electricity, heat, or steam purchased by the agency. | Megawatt hours | Total electricity consumed by facilities owned or controlled by BPA | NW, TP |
| | Therms | Total natural gas consumed by facilities owned or controlled by BPA | NW |
| | Gallons | Total fossil fuels consumed by vehicles owned or leased by BPA | NS |
| | Gallons | Total alternative fuels consumed by vehicles owned or leased by BPA | NS |
| Sustainable purchasing | | | |
| The purchase of environmentally preferable goods and services. Sustainable products are often distinguished by a third-party certification such as | Pieces | Amount of EPEAT- or ENERGYSTAR-certified electronic equipment acquired | JN |
| BioPreferred, ENERGY STAR, EPEAT, WaterSense, or other accreditation. | Pieces | Total amount of electronic equipment acquired | JN |
| | Pieces | Amount of equipment with power management features activated | JN |
| | Pieces | Total amount of electronic equipment with power management features | JN |
| | Pieces | Amount of equipment with duplex printing features activated | JN |
| | Pieces | Total amount of electronic equipment with duplex printing features | JN |
| | Pounds | Amount of printer or copier paper purchased with recycled content | NW |
| | Pounds | Total amount of printer or copier paper purchased | NW |
| | Pieces | Amount of bio-based products purchased for janitorial or landscaping activities | NW |
| | Pieces | Total amount of products purchased for janitorial or landscaping activities | NW |
| Waste recovery | | | |
| The materials from BPA's waste streams that are diverted from the landfill through recycling, | Short tons | Total amount of waste landfilled from BPA facilities | NW, NS |
| composting, sale, donation, or other reuse, including those processed by the Investment Recovery Center. | Short tons | Total amount of waste recycled from BPA facilities | NW, NS |
| | Short tons | Total amount of waste composted from BPA facilities | NW, NS |
| Water consumption | | | |

| Organization | Title | | Unique I | D |
|-----------------------------|-------------------|------------------------|----------|--------|
| Chief Administrative Office | Sustainability Pr | Sustainability Program | | |
| Author | Approved by | Date | Version | |
| Molly Hatfield | CAO, Robin Furrer | 4/17/2020 | 4.0 | Page 8 |

| The potable and non-potable water consumed by BPA facilities. | Gallons | Total potable and non-potable water consumed by facilities owned or controlled by BPA | NW |
|--|---------|---|------------|
| Pollinator habitat | | | |
| Vegetated areas suited to support pollinator species such as bees, butterflies, hummingbirds and bats. | Acres | Amount of pollinator habitat planted or enhanced | TF, EP, EC |
| Business travel | | | |
| Travel undertaken on commercial airlines for business purposes. | Miles | Total distance of short haul travel | FT |
| | Miles | Total distance of medium haul travel | FT |
| | Miles | Total distance of long haul travel | FT |

| Organization | Title | | Unique I | D | |
|-----------------------------|--------------------|------------------------|----------|--------|--|
| Chief Administrative Office | Sustainability Pro | Sustainability Program | | 720-1 | |
| Author | Approved by | Date | Version | | |
| Molly Hatfield | CAO, Robin Furrer | 4/17/2020 | 4.0 | Page 9 | |